

Jump, Christine

From: Jump, Christine
Sent: Thursday, November 05, 2015 12:26 PM
To: 'Goldstein, Michael'; Nicoski, Dan
Cc: Alan Cork; Nadine Weinberg
Subject: RE: Former SECO Products, Washington, MO - Sample Results

Categories: Record Saved - Shared

Mr. Goldstein:

We have reviewed the information sent to us; however, we did not receive the analytical data reports for the vapor samples or the pressure gradient measurements. Please submit that information to EPA.

EPA agrees that it is appropriate to seal any floor cracks and construction joints in the new office area and to collect 2 additional indoor air samples once the sealing process has been completed and encourages you to move forward with that process. EPA requests that the vapor monitoring points installed in the floor in the new office area be left in place and left accessible for potential future sampling and that the office build-out be completed with this in mind.

EPA also agrees that the initial sub-slab and indoor air sampling data presented in the table transmitted to EPA on 11-5-15 indicate TCE vapors are below appropriate screening levels and do not currently present any unacceptable risk to future office occupants.

The TCE concentrations in the sub-slab and indoor air samples, while below screening levels, do however indicate that vapor intrusion is a completed risk pathway at this site and, as indicated in the 10-27-15 email, one sampling event without a negative pressure differential in the office area is not sufficient to evaluate potential long term vapor fluctuations in the office area. Based on the reported negative pressure differential south of Alignment H, but not under the new office area, it is not clear whether the TCE detected is residual from before the depressurization system was installed, or is coming from a different area.

EPA does not anticipate having any objection to this area being actively used as office space provided the sub-slab monitoring points are still accessible; however, we would like to review the vapor analytical data sheets and pressure measurements prior to making a final determination. Additional sampling and/or mitigation may be required to confirm long term protectiveness.

Please submit the requested information and contact me if you would like to schedule a call to discuss this response.

Sincerely

Chris Jump

RCRA



545115

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From: Goldstein, Michael [mailto:Michael.Goldstein@irco.com]
Sent: Wednesday, November 04, 2015 4:54 PM
To: Jump, Christine <Jump.Chris@epa.gov>; Nicoski, Dan <Nicoski.Dan@epa.gov>
Cc: Alan Cork <Alan.Cork@erm.com>; Nadine Weinberg <Nadine.Weinberg@erm.com>
Subject: Former SECO Products, Washington, MO - Sample Results

Chris,

Please confirm your acceptance of our conclusion that the data is supportive of the Owner's proposed use and our proposed next steps and I'll authorize the team to implement the actions outlined below. If we are going to seal the floor cracks and construction joints in the new office area, we would need to do that soon. Again, we don't believe this is necessitated by the data we collected, but we're willing to do it because it is quick and cost-effective and can only be done before the build out.

Thanks

Mike

From: Nadine Weinberg [mailto:Nadine.Weinberg@erm.com]
Sent: Wednesday, November 04, 2015 5:15 PM
To: Jump, Christine; Nicoski, Dan
Cc: Alan Cork; Goldstein, Michael
Subject: Former SECO Products, Washington, MO - Sample Results

Chris:

As outlined in the email below, ERM, on behalf of Ingersoll Rand collected a groundwater sample from existing site production well and two sub-slab soil gas and indoor air samples from the office space. ERM also tested the vacuum under the slab at five locations.

The production well sample results are presented below and confirm that site-related VOCs are not affecting the production well water quality. The findings of the sample analysis were as follows:

- PRODUCTION WELL #1 – TCE, cis-1,2-DCE, trans-1,2-DCE, and VC were not detected above the laboratory method detection limits (MDL) for these compounds.
- PRODUCTION WELL #2 (BLIND DUPLICATE) – TCE, cis-1,2-DCE, trans-1,2-DCE, and VC were not detected above the laboratory MDL for these compounds.
- TRIP BLANK - TCE, cis-1,2-DCE, trans-1,2-DCE, and VC were not detected above the laboratory MDL for these compounds

For additional information please see the attached laboratory analytical report from Test America.

Based on these analytical results the on-site Production Well is not impacted with site-related VOCs and no further action is necessary.

The sub-slab soil gas and indoor air results are presented in Table 1 and confirm that vapor intrusion is not occurring at the site at levels of potential concern. Therefore, the office area can be used at the owners discretion and timeline. Consistent with our lines of evidence, we offer the following findings for the office area.

- Only trichloroethylene (TCE) was detected in sub-slab soil gas and indoor air and all results are well below the Regional Screening Levels of 8.8 ug/m3 for indoor air (more than 4x below the RSL) and 293 ug/m3 (an order of magnitude below RSL) for sub-slab soil gas (Table 1).
- The current SSDS system is effectively mitigating the sub-slab between the historical source area and the office area. As shown on Figure 1, a negative pressure differential was seen in the three locations south of Alignment H.
- Although a negative pressure reading was not seen in the office area, given the low levels of TCE detected in sub-slab soil gas and indoor air, a mitigation system is not necessary for this area.

However, because TCE was detected in indoor air (even though below screening levels), in an abundance of caution Ingersoll Rand would like to propose to seal any obvious floor cracks and construction joints in the office area. After this sealing process, we would collect two indoor air samples in the office area.

Per our prior discussions, we will document these activities in a Technical Memorandum within 30 days of our additional sampling effort.

-Nadine

Nadine Weinberg, Partner

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From: Goldstein, Michael [<mailto:Michael.Goldstein@irco.com>]

Sent: Wednesday, October 28, 2015 2:37 PM

To: Jump, Christine

Cc: Alan Cork; matthew.hrebec@yahoo.com; Peterson, Barbara; rich.nussbaum@dnr.mo.gov; Nadine Weinberg; Nicoski, Dan

Subject: Former SECO Products, Washington, MO

Chris, per our conversations, my responses are below in red. We will initiate the sampling as described below tomorrow and notify you next week when we have preliminary results. We'll also prepare a technical memorandum summarizing this work and submit it to you upon completion.

Thank you.

Mike

Michael Goldstein

Global Remediation and Transaction Manager

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From: Jump, Christine [<mailto:Jump.Chris@epa.gov>]
Sent: Thursday, October 15, 2015 4:14 PM
To: Goldstein, Michael
Cc: Alan Cork; matthew.hrebec@yahoo.com; Peterson, Barbara; rich.nussbaum@dnr.mo.gov
Subject: Former SECO Products, Washington, MO

Dear Mr. Goldstein,

I was contacted by telephone recently by Mr. Matthew Hrebec who is the current owner of the Former SECO Products facility at 5025 Old Highway 100, Washington Missouri. Mr. Hrebec intends to lease a portion of the facility for office space. In accordance with the Environmental Covenant recorded in Franklin County, Missouri on August 7, 2009, he has requested permission to:

- 1) Remove fencing from the front of the property adjacent to Old Highway 100, while specifically retaining fencing to restrict access to the sides and rear of the property;
- 2) Use the existing production well completed in the Eminence-Potosi formation for potable, on-site water.

Mr. Hrebec also informed me that he has submitted a re-zoning application to Franklin County, Missouri to change the zoning designation of the property from Suburban development to Industrial development.

I have requested that Mr. Hrebec submit a diagram of the proposed fencing changes, and a copy of the re-zoning application to EPA. I have not received those yet.

The purpose of this email is to request that Ingersoll-Rand collect a water sample and duplicate from the existing production well for volatile organic compounds and metals to confirm that it is acceptable for potable use. Ongoing sampling of the well may be required in the future to confirm that the well is not mobilizing contaminants.

RESPONSE: Per our conversation, Ingersoll Rand agrees to sample the former onsite production well for site-related Volatile Organic Compounds, specifically trichloroethylene (TCE), cis & trans-1,2 dichloroethylene (1,2-DCE), and vinyl chloride (VC), in order to: 1) confirm that the results today correlate with those collected previously and; and 2) verify that there are no detections that exceed the Maximum VOC Contaminant Levels for these compounds in drinking water as contained in 10CSR60-4.100. A water sample and a duplicate will be collected and analyzed by USEPA Method SW8260B reporting those constituents as indicated above.

EPA also requests that Ingersoll-Rand evaluate potential indoor air impacts in the area that is proposed for office use, since this area is currently not covered by the existing sub-slab vapor mitigation and monitoring

system. Monitoring to evaluate whether there are indoor air exposure levels above acceptable risk levels would, at this time, involve two sub-slab and two indoor air samples collected each quarter for a year. Alternatively, the sub-slab vapor mitigation system could be pro-actively expanded into the proposed office space. This would involve collecting one indoor air sample after the system is installed and operating to confirm that there are no unacceptable vapor exposures, and adding the new section to the operation and maintenance plan with the other sub-slab depressurization system alignments. If indoor air concentrations above acceptable levels are determined to be present, additional actions may be required.

RESPONSE: Per our conversation, Ingersoll Rand believes that there are multiple lines of evidence indicating that vapor intrusion is not an issue of concern in the office area. We will outline this in a short technical memorandum along with the following information which we will collect upon your approval:

- Collect pressure measurements between Alignment H and the office area and within the office area as shown on the attached Figure. This would confirm that the system is maintaining control of vapor movement between the former source area and the office and evaluate whether there is also vacuum directly under the office area.
- Collect two paired subslab and indoor air samples in the office area and one ambient air sample outside the building. The subslab and indoor air results would be analyzed for TCE and degradation products and compared to the TCE screening values of 293 ug/m³ and 8.8 ug/m³, respectively. Based on the subslab and indoor air results, we will also evaluate whether a site-specific attenuation factor can be calculated for the office area.
- Based on the results of the above effort, we are open to additional sampling as necessary to close any critical data gaps.

Please contact me to discuss these requests further. I will be out of the office on Friday the 16th, but available by phone the week of October 19th.

Thank you.

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